## UNITED STATES DISTRICT COURT 1 2 NORTHERN DISTRICT OF CALIFORNIA 3 SAN FRANCISCO DIVISION 4 IN RE GOOGLE PLAY STORE Case No. 3:21-md-02981-JD 5 ANTITRUST LITIGATION [PROPOSED] ORDER RE: GOOGLE'S 6 ADMINISTRATIVE MOTION TO FILE THIS DOCUMENT RELATES TO: **UNDER SEAL** 7 Epic Games, Inc. v. Google LLC et al., Case No. 3:20-cv-05671-JD 8 Judge James Donato 9 In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD 10 State of Utah et al. v. Google LLC et al., Case No. 3:21-cv-05227-JD 11 12 Match Group, LLC et al. v. Google LLC et al., Case No. 3:22-cv-02746-JD 13 Having considered Google's Administrative Motion to File Under Seal certain limited 14 portions of an exhibit (PX-170) to the January 12, 2023 Deposition of Tian Lim (MDL Dkt. No. 15 16 449-2), the Declaration of Tian Lim submitted in support of this administrative motion, and any materials submitted in support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5; 17 IT IS HEREBY ORDERED: 18 The following portions of PX-170 may be filed under seal: 19 **Document or Portion of Document Evidence Offered in** 20 Sought to be Sealed **Support of Sealing** 21 Page -362 (text between "s" and Lim Decl.¶ 2 22 "return to", between "dr d" and "/dei", between "j" and "+", between 23

24

25

26

27

28

Document or Portion of Document Sought to be Sealed

Page -362 (text between "s" and "return to", between "dr d" and "/dei", between "j" and "+", between "+ p" and "mitby," between "v" and "-declines", between "pm - m" and "w", between "m" and "y between "m" and "process", between "s" and "0%")

Page -363 (text between "sure s" and "aligned", between "to r" and "(v easy", between "for s" and "to IM",

1 2	between "to r" and "/p", between "/p" and "how", between "c" and "- how")	
3	Í Ó	Lim Decl.¶ 2
4	Page -364 (text between "with r" and "/p", between "/p" and "s", between "s" and "has pinged",	Elifi Deci.    2
5	between "work with" and "and",	
6	between "and" and "to ensure", between "random s" and "feedback",	
7	between "b" and "ready", between "ready s" and "s", between "s" and	
8	"- will")	
9	Page - 365 (text between "/ c" and "/	Lim Decl.¶ 2
10	p", between "/ p" and "- solve", between "S" and "- play", between	
11	"s" and "piracy")	L: D 160
12	Page - 366 (text between "s" and "what", between "- k" and "- exec",	Lim Decl.¶ 2
	between "pf" and "- android", between "p" and "- s", between "- s"	
14	and "feedback")	
15	Page - 367 (text between "- a" and "-	Lim Decl.¶ 2
16	good", between "- d" and "needs", between "- y" and "- pf", between "-	
17	d" and "- runway", between "a" and "/k", between "/k" and "thinking",	
18	between "-a" and "?", between "a"	
19	and "1", between "k" and "/m", between "/m" and "- free", between	
20	"s" and "/play", between "- h" and "/ s", between "/ s" and "- 'so",	
21	between "s" and "20210106",	
22	between "m" and "privacy")	
23	Page - 368 (text between "a" and "on", between "s" and "-	Lim Decl.¶ 2
24	org/culture", between "d" and "can",	
25	between "j" and "- dont")	V: D 150
26	Page - 369 (text between "- k" and "- exec", between "m" and "s team")	Lim Decl.¶ 2
27	Page - 370 (text between "s" and "/ hgpw", between "a" and "- not",	Lim Decl.¶ 2
28		l l

1 2 3 4 5	between "s" and "- jalwa", between "- j" and "- worried", between "-p" and "nog", between "m" and "- buyflow", between "- k" and "- getting", between "- v" and "/c", between "/c" and "/b", between "/b" and "(?)", between "p" and "to", between "- b" and ": going", between "- b" and "should")		
6 7	Page - 371 (text between "h" and "play", between "s" and "d", between "d" and "- stress", between	Lim Decl.¶ 2	
8	"- c" and "can't", between "s" and		
9	"/escalate", between "s" and "too", between "to s" and "/t", between "/t" and "first", between "abt s" and		
10	"to", between "c" and ". shit", between "I" and "to", between "c" and " you", between "- d" and ",		
11   12	I", between ", I" and ", c", between ", c" and ", r", between ", r" and "-		
13	felt", between "so s" and "/a", between "/a" and "disengaged", between "a" and "/d", between "/d"		
14	and "- d", between "- d" and ": ejc", between "v" and "going", between		
15	"- c" and ": d", between ": d" and "rubbing", between "v" and "mmh",		
16	between "m" and "?")		
17 18	Page - 372 (text between "s" and "-d", between "-d" and "et", between "w s" and "/s", between "/s" and "-	Lim Decl.¶ 2	
19	cros", between "- s" and "+9", between "- s" and "- existential", between "- j" and "- the", between		
20	"to S" and "'s points")		
21	Page - 373 (text between "d" and "-strategy", between "spotify/s" and "-	Lim Decl.¶ 2	
22	new", between "- s" and "existing", between "clover/s" and "- status", between "runway/s" and "-?",		
23	between "- j" and ": was")		
24	Page - 374 (text between "j" and "s team.", between "- m" and "- need",	Lim Decl.¶ 2	
25	between "j" and "s", between "s" and "/cl", between "- t" and "-		
26 27	ATC", between "betw h" and "+ m", between "+ m" and "- debug",		
28	between "w g" and "h", between "h" and "-d", between "-d" and "-		

1 2	s", between "-s" and "- pms", between "w s" and "- GTM")	
3 4 5	Page 375 (text between "s" and "- play", between "s" and "passdowns", between "s" and "whatsapp", between "- e" and ", bluetooth", between "butl" and "F", between "d" and "- a", between "-a"	Lim Decl.¶ 2
6	and "took")	
7	Page - 376 (text between "a" and "m", between "- d" and "advergeriel" between " e" and	Lim Decl.¶ 2
8	"adversarial", between "-a" and "speaking", between "at s" and "?",	
9	between "s" and "passdowns", between "- m" and "joining", between "s" and "'s team", between "- s" and "/g", between "/g" and	
11	"updating")	
12	Page - 377 (text between "k" and "-redone", between "n" and "-collab",	Lim Decl.¶ 2
13	between "s" and "- s", between "-s" and "/c", between "/c" and "not")	
14	Page - 378 (text between "s" and "/h", between "/h" and "/r", between	Lim Decl.¶ 2
15	"/r" and "last", between "- s" and "said")	
16	Page - 379 (text between "s" and "-	Lim Decl.¶ 2
17 18	feedback", between "- p" and "mail", between "m" and "/p", between "/p" and "/mmh", between	
19	"/mmh/t" and "/r", between "/r" and "-b", between "-b" and "g",	
20	between "g" and ", j", between ", j" and ", j", between ", j" and ", ss",	
21	between ", ss" and ", apps")	
22	Page - 380 (text between "j" and "r", between "r" and "- GTM")	Lim Decl.¶ 2
23	Page - 381 (text between "T" and "I" between "I" and "Vesterday"	Lim Decl.¶ 2
24	"L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday", between "T" and	
25	"L", between "L" and ", Yesterday", between "j" and "is", between "s"	
26	and "tmw", between "A" and "M", between "M" and ", Yesterday",	
27	between "T" and "L", between "L" and ", Yesterday")	
28		<u>l</u>

1	Page - 382 (text between "A" and	Lim Decl.¶ 2
2	"M", between "M" and ", Yesterday", between "T" and "L",	
3	between "L" and ", Yesterday", between "h" and "somewhere",	
4	between "A" and "M", between "M" and ", Yesterday", between "T" and	
5	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
6	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday",	
7	between "A" and "M", between "M" and ", Yesterday")	
8	Page - 383 (text between "T" and	Lim Decl.¶ 2
9	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
10	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday",	
11	between "A" and "M", between "M" and ", Yesterday", between "T" and	
12	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
13	and ", Yesterday", between "T" and "L", between "L" and", Yesterday")	
14	Page - 384 (text between "A" and	Lim Decl.¶ 2
15	"M", between "M" and ", Yesterday")	
16	Page - 385 (text between "T" and "L", between "L" and ", Yesterday",	Lim Decl.¶ 2
17	between "A" and "M", between "M"	
18	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday")	
19	Page - 386 (text between "A" and "M", between "M" and ",	Lim Decl.¶ 2
20	Yesterday", between "T" and "L", between "L" and ", Yesterday",	
21	between "A" and "M", between "M"	
22	and ", Yesterday", between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M"	
23	and ", Yesterday", between "T" and	
24	"L", between "L" and ", Yesterday", between "A" and "M", between "M"	
25	and ", Yesterday", between "s" and "/h", between "/h" and "this")	
26	Page - 387 (text between "T" and "L" between "I" and "Vesterday"	Lim Decl.¶ 2
27	"L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday", between "A" and	
28	and, residinay, between A and	

1 2	"M", between "M" and ", Yesterday")	
3	Page - 388 (text between "G" and "H", between "H" and "Yesterday",	Lim Decl.¶ 2
4 5	between "A" and "M", between "M" and ", Yesterday", between "H" and "and", between "s" and "'s head",	
6	between "G" and "H", between "H" and ", Yesterday", between "A" and "M", between "M" and ",	
7	Yesterday", between "H" and "wants", after "a")	
8	Page - 389 (text between "s" and	Lim Decl.¶ 2
9	"come", between "d" and "(and", between "- j" and "/d", between "/d" and "- appbundles", between "- d"	
10 11	and "'/d", between "/d" and "uncomfortable", between "-d" and ": 'this")	
12	Page - 390 (text between "H" and	Lim Decl.¶ 2
13	"did", between "T" and "L", between "L" and ", Yesterday",	Billi Beel.    2
14	between "A" and "R", between "R" and ", Yesterday", between "A" and "R", between "R" and "n,". between	
15	"A" and "R", between "R" and ", 6:33")	
16 17 18	Page - 391 (text between "w" and "-privacy", between "p" and "?", between "k" and " - focus")	Lim Decl.¶ 2
19	Page - 392 (text between "s" and "s"/fh" hetween "D" and "I"	Lim Decl.¶ 2
20	"ar/fb", between "D" and "L", between "L" and ", 4", between "D" and "L", between "L" and ", 1",	
21	between "l", and "d", between "d" and "/blizzard", between "g" and	
22	"c", between "c" and "n", between "n" and "/opg")	
23	Page - 393 (text between "D" and "-	Lim Decl.¶ 2
24	uber", between "r" and "- s", between "- s" and "- too", between "h" and "feedback", between "T"	
25	and "L", between "L" and ", 8")	
26	Page - 394 (text between "J" and "H", between "H" and ", 6",	Lim Decl.¶ 2
27	between "T" and "L", between "L" and ", 4", between "p" and "f",	
28		<u> </u>

1 2 3 4	between "f" and "is", between "J" and "H", between "H" and ", 3", between "P" and "has", between "T" and "L", between "L" and ", 3", between "J" and "H", between "H" and ", 3" between "E" and "on", between "P" and "it", between "A"	
5	and ", who", between "T" and "L", between "L" and ", 1", between "a"	
6	and "is", between "J" and "H", between "H" and ", 1", between "P"	
7	and "would")	
8	Page - 395 (text between "T" and "L", between "L" and", Now",	Lim Decl.¶ 2
9 10	between "it." and "H", between "H" and ", 17", between "T" and "L", between "L" and ", 15", between "J"	
11	and "H", between "H" and ", 14", between "M" and ", and", between "A" and "And", between "P" and	
12	"is", between "T" and "L", between "L" and ", 13", between "p" and	
13	"take", between "J" and "H", between "H" and ", 13")	
<ul><li>14</li><li>15</li></ul>	Page - 396 (text between "P" and "on", between "T" and "L", between "L" and ", 12", between "p" and "plays", between "p" and	Lim Decl.¶ 2
16 17	"notwithstanding", between "p" and "in", between "v" and "/p", between "/p" and "anyways", between "J"	
18	and "H", between "H" and ", 10", between "E" and "on", between "J"	
19	and "H", between "H" and ", 2", between "T" and "L", between "L"	
20	and ", 2")	
21	Page - 397 (text between "j" and "p", between "p" and "https://",	Lim Decl.¶ 2
22	between "s" and "march", between "s" and "io.", between "- s" and "/s", between "/s" and "/d", between "/d"	
23	and "/sf", between "/sf" and "")	
24 25	Page - 398 (text between "S" and "tablet", between "dd" and ": raise")	Lim Decl.¶ 2
26 27	Page - 399 (text between "s" and "store", between "(K" and "with", between "d" and "(growth)", between "j" and "(commerce)", between "c" and "(ads)", between	Lim Decl.¶ 2
28	·	

- 1		_	
1 2 3 4	"(K" and "with", between "d" and "(growth)", between "j" and "(commerce)", between "c" and "(ads)", between "K" and "&", between "e" and "(UXD)", between "b" and "(UXR)", between "- D" and ")", between "(M" and ") The")		
5 6 7	Page - 400 (text between "- a" and "- launching", between "s" and "directs", between "s" and ", moderation")	Lim Decl.¶2	
8 9 10 11 12 13 14	Page - 401 (text between "S" and "B*", between "m" and "- hc", between "- a" and "- amazing", between "- k" and "needs", between "- t" and "doing", between "t" and "/k", between "/k" and "haggling", between "- d" and "/s", between "/s" and "top", between "- y" and "strong", between "- g" and "- fine", between "- a" and "- less", between "- m" and "- super")	Lim Decl.¶ 2	
15 16 17 18 19 20 21	Page - 402 (text between "- d" and "- v", between "- a" and "stuff", between "(b" and ". phonesky", between "(t" and ")", between "- m" and ": creating", between "- y" and "rearrange", between "- m" and "/h", between "/h" and "relationship", between "-j" and "trying", between "j" and "gave", between "- m" and "never", after "to m")	Lim Decl.¶ 2	
22   23   24   25   26   27   28	Page - 403 (text between "p" and "f", between "f" and "to", between "a" and ", p", between ", p" and ", k", between ", k" and "get", between "d" and "- serious", between "d" and "DEI", between "ml" and ", g", between ", g" and ", j", between ", j" and "ch", between "ch" and ", a", between ", a" and "n", between "n" and ", m", between ", m" and "b",	Lim Decl.¶2	

1 2 3 4	between "b" and ", j", between ", j" and "k", between "k" and ")", between "k" and "/pf", between "g" and "/a", between "/a and "shine")		
5 6 7 8	Page -404 (text between "with p" and "@", between "p" and "and i", between "with p" and "ran roundtables", between "such as d" and "t", between "t" and "founders", between "and g" and "is sufficiently")	Lim Decl.¶ 2	
9 10 11 12 13 14	Page -405 (text between "a" and "m", between "a" and "/t", between "/t" and "/s", between "/s" and "-overtly", between "mmh - m" and "m" and "working", between "asked a" and "to be quiet", between "m" and "hadn't", between "is a" and "partnering", between "w d" and "?", between "c" and "- subs")	Lim Decl.¶ 2	
15 16 17 18 19 20	Page -406 (text between "g" and "rant", between "to D" and "last time", between "mean if D" and "wants", between "T" and "L", between "L" and ", Yesterday 7:36", between "say g" and "is a", between "A" and "M", between "M" and ", Yesterday", between "was s" and "s pointing", between "ask r" and "for feedback")	Lim Decl.¶ 2	
<ul> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> <li>38</li> </ul>	Page -407 (text between "thing. s" and "is there", between "but g" and "is not", between "b" and "/r", between "/r" and "/d", between "/d" and "/s", between "/s" and "have been", between "a" and "for the", between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday", between "pingd a" and "for his", between "T" and "L", between "L"	Lim Decl.¶ 2	

28

2	and ", Yesterday 7:42", between "A" and "M", between "M" and ", Yesterday 7:50")		
3   4   5   6   7   8   9	Page -408 (text between "Per r" and "No feedback", between "that S" and "basically", between "A" and "M", between "M" and ", Yesterday 8:01", between "A" and "M", between "M" and ", Yesterday 8:12", between "a" and "gut", between "T" and "L", between "L" and ", Yesterday", between "A" and "M", between "M" and ", Yesterday 8:17")	Lim Decl.¶ 2	
0 1 2 3	Page -409 (text between "minimum s" and "/a", between "/a" and "who run", between "Per r" and "No feedback", between "that S" and "basically", between "l" and "lib arts").	Lim Decl.¶ 2	
5	Page -410 (text between "s" and "/salesforce")	Lim Decl.¶ 2	
16 17 18	Page -411 (text between "- p" and ": conviction", between "priorities s" and "/s", between "/s" and "/play", between "s" and "passdowns")	Lim Decl.¶ 2	
18 19 20 21 22 23	Page -412 (text between "s" and "-pf", between "when s" and "not there", between "p" and "asked question", between "s" and ": dont expect", between "s" and "i just have", between "pb/k" and "were", between "s" and ": what", between "s" and ": you")	Lim Decl.¶ 2	
23   24	Page -413 (text between "-v" and "-go build")	Lim Decl.¶ 2	
25 26 27	Page -414 (text between "does m" and "zoom", between "d" and "-strong", between "c" and ":indifference")	Lim Decl.¶ 2	

28

1	Page -417 (text between "a" and	Lim Decl.¶ 2	
2	"notes")		
3 4	Page -418 (text between "j" and "j", between "j" and "feedback", between "h" and "I worked",	Lim Decl.¶ 2	
5	between "with J" and "awhile", between "on R" and "T", between		
6	"T" and "and myself", between "R"		
7	and "worked", between "with J" and "R", between "R" and "would,		
8	between "with J" and ".", between "b" and "s", between "s" and "Yes",		
9	between "drove B" and "nuts", between "H" and "was on", between		
10	"r" and "l", between "l" and "Yes", between "Mr. J" and ". He")		
11	Page -419 (text between "g" and	Lim Decl.¶ 2	
12	"/devmktg", between "G" and "H", between "H" and ", 19 min",		
13	between "through K" and ")",		
14	between "j" and "s", between "s" and "etc.", between "k" and "->		
15	LA", between "r" and ", boston", between "T" and "L", between "L"		
16	and "33 min", between "K" and G", between "G" and ", 17 min",		
17 18	between "T" and "L", between "L" and ", 16 min")		
19	Page -420 (text between "K" and	Lim Decl.¶ 2	
20	"G", between "G" and "16 min", between "K" and "G", between "G"		
21	and "14 min", between "T" and "L", between "L" and "12 min", between		
22	"K" and "G", between "G" and "7 min", between "T" and "L", between		
23	"L" and "5 min", between "K" and "G", between "G" and "5 min",		
24	between "T" and "L", between "L"		
25	and "4 min", between "K" and "G", between "G" and "1 min", between		
26	"A" and "B", between "B" and "and F", between "and F" and "L",		
27	between "L" and ". R", between ". R" and "and I", between "A" and		
28	, , , , , , , , , , , , , , , ,		

1 2 3 4 5	"and F", between "and F" and "are primary", between "will be L" and "K", between "K" and "and K", between "and K" and "S", between "S" and ". T", between ". T" and "is supporting", between "role R" and "and I").		
6   7   8   9   10	Page -422 (text between "a" and "[geist]", between "now l" and ")", between "k" and ", m", between "m" and ", s", between "s" and ", m", between "m" and "d", between "d" and "not self", between "from s" and "anymore", between "h" and "me/m", between "me/m" and "-structure")	Lim Decl.¶ 2	
11 12 13 14 15	Page -424 (text between "L" and "convo", between "T" and "L", between "L" and "11:48", between "L" and "Z", between "Z" and "1:05", between "T" and "L", between "L" and "1:13", between "L" and "Z", between "Z" and "55 min")	Lim Decl.¶ 2	
16 17 18 19	Page -425 (text between "T" and "L", between "L" and "50 min", between "L" and "Z", between "Z" and "50 min", between "L" and "Z", between "Z" and "40 min")	Lim Decl.¶ 2	
20 21 22 23 24	Page -426 (text between "T" and "L", between "L" and "38 min", between "L" and "Z", between "Z" and "35 min", between "T" and "L", between "L" and "33 min", between "L" and "Z", between "Z" and "33 min", between "L" and "Z", between "Z" and "31 min", between "L" and "Z", between "Z" and "31 min", between "L" and "Z", between "Z" and "28 min")	Lim Decl.¶ 2	
25 26 27 28	Page -427 (text between "T" and "L", between "L" and "24 min", between "L" and "Z", between "Z" and "23 min", between "T" and "L", between "L" and "22 min", between	Lim Decl.¶ 2	

2	"L" and "Z", between "Z" and "21 min", between "L" and "Z", between "Z" and "13 min")
3 4 5 6	Page -428 (text between "T" and "Lim Decl.¶ 2  "L", between "L" and "9 min", between "Z" and "9 min", between "T" and "L", between "L" and "7 min")
7 8 9 10 11 12 13	Page -429 (text between "L" and "Z", between "Z" and "6 min", between "T" and "L", between "L" and Z", between "Z" and "4 min", between "T" and "L", between "L" and "3 min", between "L" and "Z", between "Z" and "2 min", between "p" and "p", between "p" and "p", between "p" and "P", between "T" and L", between "L" and "Now", between "L" and "Z", between "Z" and "Now")
15 16 17 18 19	Page -430 (text between "s" and "4 priorities", between "wear/r" and "play", between "changes/t" and "testimony", between "p" and "foldables", between "ss" and "hc ask", between "sit w s" and "t", between "t" and "one company", between "h" and "update", between "s" and "next")
20 21 22	Page -431 (text between "regression, e" and "issues", between "b" and "ready", between "t" and "to try", between "m" and "devrel")
23 24 25 26 27 28	Dated:, 2023  Honorable James Donato United States District Judge Northern District of California
20	12 [PROPOSED] ORDER GRANTING GOOGLE'S ADMIN. MOT. TO FILE UNDER SEAL Case Nos. 3:21-md-02981-JD